

Polek, Jim

From: Boston, Scott <SBoston@haleyaldrich.com>
Sent: Monday, February 09, 2015 8:25 PM
To: Polek, Jim
Cc: Hiete, Ryan (R.Hiete@MPGLAW.com); w.carter@mpglaw.com; Barry Groveman (bgroveman@me.com)
Subject: SWCC Site Visit and Document Request
Attachments: 106846_tote_visual_assessment_20141230.pdf; Process Flow Diagram.pdf

Jim,

It was nice to meet you today and provide some background information related to the SCWW treatment process.

With regard to your request for documentation, this is my understanding of what you have requested to date:

- 1) Provide a copy of your Initial Certification Statement submitted to the permitting authority, the City of Oxnard, as required in 40 CFR 437.47(a)(2).
- 2) Provide copies of your On-site Compliance Paperwork, as required in 40 CFR 437.47(a)(4), for the past 5-years.
- 3) Provide a list of customers for the past 5-years.
- 4) Provide copies of bills of lading, manifests, invoices, and/or logs that document receipt of wastes from your customers for the last 5-years.
- 5) Provide a detailed written description of your waste acceptance procedures, including when waste samples are collected, and names and titles of personnel involved in the waste approval process. If you have written waste(s) acceptance Standard Operating Procedures (SOP), provide a copy of the written procedures that were in effect at the time of the November 18, 2014 incident. If applicable, when was the last time the written SOP was revised? If applicable, why was the SOP revised? During the last 5-years did the facility accept waste(s) that did not conform to your written waste acceptance requirements? If yes, provide a list of customers, with contact information and description of the waste streams that did not meet the facility's waste acceptance protocols, but were approved to shipped to and treated by the facility. Also, who specifically approved the deviation from the written waste acceptance procedures?
- 6) Do your customers provide waste profiles? If so, did your customers submit the waste profile information prior to the initial shipment or was the profile information provided with each load of waste shipped to the facility? Does the waste profile information submitted by customers include analytical data for each waste stream accepted by the facility?
- 7) In the past 5-years, have any waste shipments been rejected? If so, provide a list of these shipments and to which facilities these rejected wastes were shipped.
- 8) In the past 5-years, other than the November 18, 2014 event, have there been incidents where the wastes accepted for treatment caused an interruption in the facility's operation? If yes, please provide a list of the events and include: customer name and contact information, brief description of the event, a copy of the shipping document, and the date of the event.
- 9) Provide copies of the Discharge Monitoring Results for the past five years.

- 10) A copy of the process flow diagram for the SCWW Plant (attached).
- 11) The Tank & Tote Inventory that was completed as a requirement of the EPA OSC closing his response action (attached).
- 12) Information regarding dissolved hydrogen sulfide in the waste stream and records of complaints received associated with odors that could be related to released hydrogen sulfide.
- 13) Information associated with SCWW's analysis of the Gross Beta issue.
14. Communications with the County of Ventura's District Attorney's office regarding site records that they may be in possession of.
15. Operating hours for the facility per the C.U.P.
16. Information related to the former surface impoundments and investigations conducted in response to regulatory actions associated with those surface impoundments.

We'll start rounding up the documents as we can and will keep you up-to-date on our progress.

Scott A. Boston, CIH, CSP, CPEA

Chief Regulatory Specialist – Health & Safety
Technical Expert

Haley & Aldrich, Inc.

3187 Red Hill Avenue, Suite 155
Costa Mesa, CA 92626

T: 714.371.1816
C: 951.288.9371

sboston@haleyaldrich.com

www.haleyaldrich.com